



The Honorable Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: IB 11-109 LightSquared's Petition for Declaratory Ruling

Dear Chairman Genachowski:

Thank you for the opportunity to comment in support of LightSquared's proposed mobile broadband network and its Petition for Declaratory Ruling.

First, let's look at the context: LightSquared's network would spur competition and innovation in the wireless industry while, perhaps most importantly, advancing the Commission's goal of expanding the nation's wireless broadband capacity and reaching underserved communities – all without a penny of taxpayer money.

The Professional Photographers of Ohio has members throughout Ohio and the a stronger, more robust broadband not only allows for greater access, but also the possibility of new innovation in the world of photography as it relates to the transmission and creation of large format files.

As we understand it, LightSquared has played by the rules, following regulatory procedures and processes for a decade as it prepared its licensed spectrum for this network. When interference concerns have been raised, the company has taken steps to address them. In 2011 alone, for example, it voluntarily altered its deployment plan, reduced the power of its signals, contracted with GPS manufacturers to develop technologies that would solve the interference problems and offered to pay for government-owned GPS receivers to be upgraded – all good-faith efforts aimed at co-existing with GPS.

When a photographer captures an image, it is now the property of the photographer. If someone else wants to use that image, they must get the permission of the photographer. Here, it appears as though the spectrum that LightSquared had the rights to has been used without their consent . . . and now seems to be preventing them from finalizing the deployment of needed technological infrastructure.

As the Commission stated in April 2011, GPS devices should "reasonably discriminate against reception of signals outside their allocated spectrum." The GPS device user manuals even state that, according to FCC rules, GPS devices "must accept any interference received, including interference that may cause undesired operation." Again, not unlike other photographers knowing they cannot use others images without their consent.

The rules are clear, as is the rational course forward. LightSquared should be authorized to commence operations in the spectrum it is licensed to use, and the GPS industry should install filters to deal with interference if it chooses to operate in spectrum it is not licensed to use.

Sincerely,

A handwritten signature in dark ink, appearing to be 'P. Craig', written over the word 'Sincerely,'.

Philip A. Craig
Executive Director

cc: Asst. Secretary Lawrence E. Strickling, NTIA

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